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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ELENA JULL, and DERRICK JULL,

Plaintiffs,

v.

VALLEY HEALTH SYSTEM LLC;  
CENTENNIAL HILLS HOSPITAL MEDICAL  
CENTER; and SUMMERLIN HOSPITAL  
MEDICAL CENTER;

Defendants.

**Case No. 2:21-cv-01353-GMN-BNW**

**MOTION AND ORDER TO  
WITHDRAW AS COUNSEL and  
EXPARTE REQUEST TO STAY  
PROCEEDINGS 45 Days and  
EXTEND ALL DEADLINES 90  
DAYS**

**(First Request for Withdrawal,  
Second Request for Extension of all  
Deadlines)**

Pursuant to LR IA 11-6(b) and LR IA 6-1, Plaintiff's counsel, hereby state as follows:

1. Our firm represents the Plaintiffs, Derrick Jull and Elena Jull, in the above mentioned matter.
2. We respectfully request Your Honor's permission to withdraw as counsel in this matter and to stay all proceedings in this matter for forty-five (45) days to give Plaintiffs the opportunity to find new counsel.
3. We are requesting permission to withdraw due to an irreconcilable conflict between the clients and this firm, and because we have been discharged by the clients (though the clients now seek to withdraw that discharge). Under Nev. R. Prof. Conduct 1.16(a)(3),

1 withdrawal is *required* when the client discharges the lawyer.

- 2 4. We are also requesting that the Court allow us to detail the reasons for withdrawal be  
3 under seal and in-camera (*i.e.*, outside the presence of Defendants' counsel) to protect  
4 against improper and unnecessary disclosure of attorney client privileged and confidential  
5 communications, within the meaning of Nev. R. Prof'l Conduct 1.6, and to protect  
6 Derrick Jull and Elena Jull from prejudice in furtherance of their case.
- 7 5. Should Your Honor request an *in camera* conference to further discuss this matter, we are  
8 amenable to the same.
- 9 6. Counsel understands under LR IA-6 (d), a motion to withdraw does not stay any  
10 deadlines in this case.
- 11 7. But in the interests of protecting Plaintiffs from prejudice, counsel requests a 90 day  
12 extension of all deadlines in this matter.
- 13 8. Counsel will contemporaneously serve this motion on the Clients to give them an  
14 opportunity to respond within 14 days of this motion pursuant to LR IA-6 (b),  
15

16 Thus for good cause and not for the purpose of delay, the plaintiffs' counsel request that the  
17 discovery period be extended as follows:

18 Activity	Current Date	Requested Date
19 Discovery Cut-Off Date	06/01/2022	09/01/2022
20 Dispositive Motions	08/01/2022	11/01/2022
21 Pretrial Order	10/01/2022	1/02/2022

22 This request is being made within 21 days of the current discovery cut-off and other deadlines.  
23 Further any further requests for extensions will be made at least 21 days before the deadline that  
24 extension of is sought.

25 Dated: April 18, 2022  
26  
27  
28

Respectfully Submitted,



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**ORDER**

IT IS ORDERED that ECF No. 29 and the joinder at ECF No. 33 are GRANTED subject to the following conditions.

IT IS FURTHER ORDERED that Mr. Rozynski must serve a copy of this Court's order on Plaintiffs by 5/5/2022.

IT IS FURTHER ORDERED that Mr. Rozynski must file a notice of compliance with this Court's order and the Plaintiffs' last known addresses so the Court can update its docket by 5/5/2022.

**IT IS SO ORDERED**

**DATED:** 9:38 pm, May 01, 2022



**BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE**